



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

MAR 11 2019

Re: PMN P-18-0272

Dear [REDACTED]

This letter responds to the above-referenced Premanufacture Notice (PMN), received by the Environmental Protection Agency (EPA) on August 7, 2018. The PMN described the chemical substance as Metal, alkylcarboxylate oxo complexes.

EPA has determined in accordance with section 5(a)(3)(C) that this PMN substance is not likely to present an unreasonable risk of injury to health or the environment under the intended and reasonably foreseen conditions of use.

Under TSCA section 5(g), you may begin manufacture of this PMN substance immediately and do not need to wait for the 90-day review period to expire. Please note that 40 CFR 720.102 requires you, within the first 30 days of commencement of manufacture (which includes import) of a PMN substance, to submit a Notice of Commencement (NOC) to EPA. Because you submitted your PMN to EPA after the effective date of the electronic-PMN ("eTSCA/ePMN") final rule (75 FR 773), you must use the eTSCA/ePMN software to submit your NOC. After April 6, 2012, all submissions are required to be submitted electronically via the internet using the Central Data Exchange (CDX). Please see [www.epa.gov/reviewing-new-chemicals-under-toxic-substances-control-act-tsca/how-submit-e-pmn](http://www.epa.gov/reviewing-new-chemicals-under-toxic-substances-control-act-tsca/how-submit-e-pmn) for more information on the e-PMN software and directions on how to register and submit notices via CDX.

If you have any questions or comments, please contact me at (202) 564-8469.

Sincerely,

Greg Schweer, Chief  
New Chemicals Management Branch